

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

ANTONIA DETOLEDO, LIANA)
WILLIAMS)
Plaintiffs)
)
v.)
)
COUNTY OF SUFFOLK, et. al.,)
Defendants)

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

RECEIPT # 46945
AMOUNT \$ 150
SUMMONS ISSUED _____
LOCAL RULE 4.1 _____
WAIVER FORM _____
MCF ISSUED _____
BY DPTY. CLK. 78
DATE 5-5-83

03-10834 RGS

MAGISTRATE JUDGE Collings

NOTICE OF REMOVAL

The Defendants-Petitioners, Suffolk County et. al., petitions pursuant to 28 U.S.C. § 1441 for removal from the Superior Court Department of the Trial Court of the Commonwealth of Massachusetts of the action entitled *DeTeledo v. County of Suffolk* pending in Suffolk County as Civil Action No. 01-1297.

1. This action involves allegations that the Defendants deprived the Plaintiffs of their constitutional rights and was brought pursuant to 42 U.S.C. § 1983.
2. This action is subject to removal by the Defendants-Petitioners by virtue of the provisions of 42 U.S.C. § 1441.
3. This Petition of Removal is filed within thirty (30) days of the receipt of the Summons and Complaint, copies of which are attached hereto.

Wherefore, the Defendants petition that this action be removed and that judgement of dismissal be entered on the Plaintiff's Complaint.

Respectfully Submitted
For Defendants Sylvia
Thomas, Angelo Rao, Janet
Sinclair, Owen Julius and
Suffolk County,
By their Attorney,

DATE: 4/15/03

Kathleen M. Cawley

Kathleen M. Cawley
Assistant General Counsel
BBO# 551202
Suffolk County Sheriff's Dept
200 Nashua Street
Boston, MA 02114
(617) 635-1100 ext. 6680

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and accurate copy of the forgoing Motion for Removal to be served upon the Plaintiff's Attorney Susan M. Bourque, One Constitution Center, Boston, MA 02129 by first class mail, postage prepaid, this 5th day of May, 2003.

Kathleen M. Cawley
Kathleen M. Cawley

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT DEPT.
C.A. No. 01-1297C

ANTONIA DeTOLEDO and)
LIANA WILLIAMS,)
Plaintiffs)
v.)
COUNTY OF SUFFOLK,)
Lt. ANGELO RAO, Sgt. JANET)
SINCLAIR, Sgt. OWEN JULIUS, Dpty.)
SYLVIA THOMAS,)
Defendants.)

**PLAINTIFFS' SECOND AMENDED
COMPLAINT AND JURY DEMAND**

5310824

GENERAL ALLEGATIONS

1. The plaintiff, Antonia DeToledo, is a citizen of the United States of America and the Commonwealth of Massachusetts and is a resident of East Boston, County of Suffolk.
2. The plaintiff, Liana Williams, is a citizen of the United States of America and the Commonwealth of Massachusetts and is a resident of Boston, County of Suffolk.
3. The defendant, County of Suffolk, is a county within the Commonwealth of Massachusetts, and who at all times relevant hereto, was the public employer for the South Bay House of Corrections.
4. The defendant, Lt. Angelo Rao, is an individual who is a citizen of the Commonwealth of Massachusetts and whose address is unknown at this time, but who at all times relevant hereto was employed by the Suffolk County Sheriff's Department and was a Captain at the South Bay House of Corrections.
5. The defendant, Sgt. Janet Sinclair, is an individual who is a citizen of the Commonwealth of Massachusetts and whose address is unknown at this time, but who at all times relevant hereto was employed by the Suffolk County Sheriff's Department and was a sergeant at the South Bay House of Corrections.

6. The defendant, Sgt. Owen Julius, a citizen of the Commonwealth of Massachusetts and whose address is unknown at this time, but who at all times relevant hereto was employed by the Suffolk County Sheriff's Department and was a sergeant at the South Bay House of Corrections.
7. The defendant, Deputy Sylvia Thomas, a citizen of the Commonwealth of Massachusetts and whose address is unknown at this time, but who at all times relevant hereto was employed by the Suffolk County Sheriff's Department and was a sergeant at the South Bay House of Corrections.
8. On or about July 26, 1998, the plaintiffs were lawful visitors at the South Bay House of Corrections.
9. On or about July 26, 1998, the plaintiff, Liana Williams, was unlawfully detained for an extended period of time and subjected to an invasive "strip search" while unlawfully detained by employees and/or agents of the Suffolk County Sheriff's Department.
10. On or about July 26, 1998, the plaintiff, Antonia DeToledo, was unlawfully detained for an extended period of time by employees and/or agents of the Suffolk County Sheriff's Department.
11. On June 30, 2000, plaintiffs timely notified the defendant, County of Suffolk, in writing, of their intention to pursue claims for personal injury and emotional distress against employees and/or agents of the Suffolk County Sheriff's Department, by presenting a Massachusetts Tort Claims letter to Mayor Thomas Menino and the Boston City Council, as county commissioners designates pursuant to G.L. c. 34, § 4. Please see copies of the Massachusetts Tort Claim Notice Letters attached hereto at Tab 1.
12. Now, more than six months after the plaintiffs presented their Massachusetts Tort Claims Letter to Mayor Thomas Menino and to the Boston City Council, and with no receipt of a formal denial therefrom, the plaintiffs commence litigation pursuant to G.L. c. 258, § 4.

COUNT I

**CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE
DEFENDANT, COUNTY OF SUFFOLK, FOR PERSONAL INJURIES
PREDICATED UPON NEGLIGENCE**

13. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 12.

14. On or about July 26, 1998, the plaintiff, Antonia DeToledo, while a lawful visitor at the South Bay House of Corrections, was negligently identified as the subject of a warrant by employees, agents, and/or servants of the defendant, County of Suffolk, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, and was unlawfully detained in a holding cell for an extended period of time.
15. On or about July 26, 1998, the defendant, County of Suffolk, through its employees, agents, and/or servants, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, failed to take even the most basic steps to ensure that the plaintiff, Antonia DeToledo, was in fact the individual that was the subject of the warrant.
16. As a direct and proximate result of the defendant's negligence, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.
17. As a result of the foregoing, the plaintiff is entitled to recover damages from the defendant, County of Suffolk, in an amount deemed fair and equitable to compensate her for the injuries caused by the defendant's negligence and other losses together with interests and costs.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, County of Suffolk, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs.

COUNT II

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, COUNTY OF SUFFOLK, FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENCE.

18. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 17.
19. On or about July 26, 1998, the plaintiff, Liana Williams, while a lawful visitor at the South Bay House of Corrections, was misidentified as the subject of a warrant by employees, agents, and/or servants of the defendant, County of Suffolk, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, and was unlawfully detained in a holding cell for an extended period of time.
20. On or about July 26, 1998, the plaintiff, while unlawfully detained by the defendant's employees, was subjected to an unlawful, humiliating, and invasive "strip search."

21. On or about July 26, 1998, the defendant, County of Suffolk, through its' employees, agents, and/or servants, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, failed to take even the most basic steps to ensure that the plaintiff, Liana Williams, was in fact the individual that was the subject of the warrant.
22. As a direct and proximate result of the defendant's negligence, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.
23. As a result of the foregoing, the plaintiff is entitled to recover damages from the defendant, County of Suffolk, in an amount deemed fair and equitable to compensate her for the injuries caused by the defendant's negligence and other losses together with interests and costs.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, County of Suffolk, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs.

COUNT III

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, COUNTY OF SUFFOLK, FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENT SUPERVISION AND TRAINING

24. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 23.
25. On or about July 26, 1998, the defendant, County of Suffolk, failed to adequately supervise and train its' employees, agents, and/or servants, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, as to proper identification and detainment procedures that should be utilized when identifying and detaining individuals.
26. On or about July 26, 1998, the defendant's employees, agents, and/or servants, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, negligently identified the plaintiff, Antonia DeToledo, as the subject of a warrant and was unlawfully detained in a holding cell for an extended period of time.
27. As a direct and proximate result of the defendant's negligence, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

28. As a result of the foregoing, the plaintiff is entitled to recover damages from the defendant, County of Suffolk, in an amount deemed fair and equitable to compensate her for the injuries caused by the defendant's negligence and other losses together with interests and costs.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, County of Suffolk, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs.

COUNT IV

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, COUNTY OF SUFFOLK, FOR PERSONAL INJURIES PREDICATED UPON NEGLIGENT SUPERVISION AND TRAINING

29. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 28.
30. On or about July 26, 1998, the defendant, County of Suffolk, failed to adequately supervise and train its' employees, agents, and/or servants, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, as to proper identification and detainment procedures that should be utilized when identifying and detaining individuals.
31. On or about July 26, 1998, the defendant's employees, agents, and/or servants, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas, negligently identified the plaintiff, Liana Williams, as the subject of an outstanding warrant and unlawfully detained her in a holding cell for an extended period of time.
32. On or about July 26, 1998, the plaintiff, while unlawfully detained by the defendant's employees, to wit Angelo Rao, Janet Sinclair, Owen Julius, and Sylvia Thomas ,was subjected to an unlawful, humiliating, and invasive "strip search."
33. As a direct and proximate result of the defendant's negligence, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.
34. As a result of the foregoing, the plaintiff is entitled to recover damages from the defendant, County of Suffolk, in an amount deemed fair and equitable to compensate her for the injuries caused by the defendant's negligence and other losses together with interests and costs.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, County of Suffolk, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs.

COUNT V

**CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE
DEFENDANT, ANGELO RAO, FOR PERSONAL INJURIES AND EMOTIONAL
DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS
CIVIL RIGHTS ACT.**

35. The plaintiffs repeat, reallege, and fully incorporates herein paragraphs 1 through 34.
36. On or about July 26, 1998, the defendant, while in the course of his employment with the County of Suffolk created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
37. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
38. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Angelo Rao, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest, costs and reasonable attorney's fees.

COUNT VI

**CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE
DEFENDANT, ANGELO RAO, FOR PERSONAL INJURIES AND EMOTIONAL
DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS
CIVIL RIGHTS ACT.**

39. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 38.

40. On or about July 26, 1998, the defendant, while in the course of his employment with the County of Suffolk, created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
41. The defendant further interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
42. On or about July 26, 1998, the defendant further violated the plaintiff's basic right to be free from excessive and/or unreasonable force, guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, when the defendant subjected the plaintiff to an unlawful, humiliating, and invasive "strip search."
43. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Angelo Rao, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT VII

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, ANGELO RAO, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C., § 1983

44. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 43.
45. On or about July 26, 1998, the defendant, Angelo Rao, an employee of the Suffolk County Sheriff's Department, abused his position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
46. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically

removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.

47. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Angelo Rao, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT VIII

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, ANGELO RAO, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C., § 1983

48. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 47.
49. On or about July 26, 1998, the defendant, Angelo Rao, an employee of the Suffolk County Sheriff's Department, abused his position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
50. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
51. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Angelo Rao, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorneys' fees.

COUNT IX

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, JANET SINCLAIR, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS CIVIL RIGHTS ACT.

52. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 51.
53. On or about July 26, 1998, the defendant, Janet Sinclair, while in the course of her employment with the County of Suffolk created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
54. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
55. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Janet Sinclair, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest, costs and reasonable attorney's fees.

COUNT X

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, JANET SINCLAIR, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS CIVIL RIGHTS ACT.

56. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 55.
57. On or about July 26, 1998, the defendant, while in the course of her employment with the County of Suffolk, created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.

58. The defendant further interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
59. On or about July 26, 1998, the defendant further violated the plaintiff's basic right to be free from excessive and/or unreasonable force, guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, when the defendant subjected the plaintiff to an unlawful, humiliating, and invasive "strip search."
60. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Janet Sinclair, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XI

**CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE
DEFENDANT, JANET SINCLAIR, FOR PERSONAL INJURIES AND
EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF
42 U.S.C. § 1983**

61. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 60.
62. On or about July 26, 1998, the defendant, Janet Sinclair, an employee of the Suffolk County Sheriff's Department, abused her position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
63. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
64. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Antonia DeToledo,

was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToeldo, demands judgment against the defendant, Janet Sinclair, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XII

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, JANET SINCLAIR, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C., § 1983

65. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 64.
66. On or about July 26, 1998, the defendant, Janet Sinclair, an employee of the Suffolk County Sheriff's Department, abused her position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
67. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
68. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Janet Sinclair, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XIII

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, OWEN JULIUS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS CIVIL RIGHTS ACT.

69. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 68.
70. On or about July 26, 1998, the defendant, Owen Julius, while in the course of his employment with the County of Suffolk created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
71. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
72. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Owen Julius, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest, costs and reasonable attorney's fees.

COUNT XIV

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, OWEN JULIUS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS CIVIL RIGHTS ACT.

73. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 72.
74. On or about July 26, 1998, the defendant, Owen Julius, while in the course of his employment with the County of Suffolk, created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
75. The defendant further interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.

76. On or about July 26, 1998, the defendant further violated the plaintiff's basic right to be free from excessive and/or unreasonable force, guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, when the defendant subjected the plaintiff to an unlawful, humiliating, and invasive "strip search."
77. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Owen Julius, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XV

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, OWEN JULIUS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C. § 1983

78. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 77.
79. On or about July 26, 1998, the defendant, Owen Julius, an employee of the Suffolk County Sheriff's Department, abused his position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
80. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
81. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Owen Julius, in an amount deemed fair and reasonable to fully compensate the

plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XVI

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, OWEN JULIUS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C., § 1983

82. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 81.
83. On or about July 26, 1998, the defendant, Owen Julius, an employee of the Suffolk County Sheriff's Department, abused his position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
84. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
85. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Owen Julius, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XVII

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, SYLVIA THOMAS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS CIVIL RIGHTS ACT.

86. The plaintiffs repeat, reallege, and incorporate fully herein paragraphs 1 through 85.
87. On or about July 26, 1998, the defendant, Sylvia Thomas, while in the course of her employment with the County of Suffolk created a threatening,

intimidating, and coercive environment at the South Bay House of Corrections.

88. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
89. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Sylvia Thomas, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest, costs and reasonable attorney's fees.

COUNT XVIII

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, SYLVIA THOMAS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF THE MASSACHUSETTS CIVIL RIGHTS ACT.

90. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 89.
91. On or about July 26, 1998, the defendant, Sylvia Thomas, while in the course of her employment with the County of Suffolk, created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
92. The defendant further interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
93. On or about July 26, 1998, the defendant further violated the plaintiff's basic right to be free from excessive and/or unreasonable force, guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, when the defendant subjected the plaintiff to an unlawful, humiliating, and invasive "strip search."

94. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the Declaration of Rights of the Commonwealth of Massachusetts, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Sylvia Thomas, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XIX

CLAIM OF THE PLAINTIFF, ANTONIA DeTOLEDO, AGAINST THE DEFENDANT, SYLVIA THOMAS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C. § 1983

95. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 94.
96. On or about July 26, 1998, the defendant, Sylvia Thomas, an employee of the Suffolk County Sheriff's Department, abused her position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
97. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
98. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Antonia DeToledo, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Antonia DeToledo, demands judgment against the defendant, Sylvia Thomas, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

COUNT XX

CLAIM OF THE PLAINTIFF, LIANA WILLIAMS, AGAINST THE DEFENDANT, SYLVIA THOMAS, FOR PERSONAL INJURIES AND EMOTIONAL DISTRESS PREDICATED UPON VIOLATIONS OF 42 U.S.C., § 1983

99. The plaintiffs repeat, reallege, and fully incorporate herein paragraphs 1 through 98.
100. On or about July 26, 1998, the defendant, Sylvia Thomas, an employee of the Suffolk County Sheriff's Department, abused her position of power and control and created a threatening, intimidating, and coercive environment at the South Bay House of Corrections.
101. On or about July 26, 1998, the defendant interfered with the plaintiff's right to be free from excessive and/or unreasonable force and the plaintiff's right to be free from deprivation of liberty without due process of law by physically removing the plaintiff from the waiting area of the South Bay House of Corrections to a holding cell within the facility.
102. As a result of the defendant's interference with the plaintiff's basic rights guaranteed by the United States Constitution, the plaintiff, Liana Williams, was caused to suffer and did suffer incident-related injuries and emotional distress.

WHEREFORE, the plaintiff, Liana Williams, demands judgment against the defendant, Sylvia Thomas, in an amount deemed fair and reasonable to fully compensate the plaintiff for all of her incident-related injuries and losses, together with interest and costs and reasonable attorney's fees.

THE PLAINTIFFS DEMAND TRIAL BY JURY

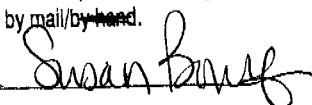
Respectfully submitted,
The Plaintiffs,
By their Attorneys,



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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail/by hand.

Dated: 9-6-02 

Dated: 9-6-02